
Appendix A

Analysis of Scoping Comments

Nat Brown Fencing Project

Two letters specific to the project were received during the scoping period of May 27, 2016 to June 27, 2016. The letters were analyzed and an analysis code assigned to the comments (see Table 1).

Comment Analysis Codes

- 1: Outside the scope of the proposed action.
- 2: Already decided by law, regulation, Forest Plan, or other higher level of decision.
- 3: Irrelevant to the decision to be made.
- 4: Conjectural and not supported by scientific evidence.
- 5: General comment, suggestion, opinion, or position statement.
- 6: Other agency or partner's consultation, review, advice, recommendation(s), etc.
- 7: Already considered in the proposed action or is standard procedure.
- 8: Will be included in an analysis of effects to the environment.

Codes 1 – 6 are standard codes. Comments assigned to these codes are considered to be non-significant issues. Code 7 was added as a category for those suggestions that are already proposed or for procedures that are routinely done. Code 8 was added as a category for suggestions that will be analyzed for effects to the environment.

Table 1: Comment Analysis

Commenter	Comment	Disposition
Gary McFarlane Friends of the Clearwater	While [the] project might improve riparian condition, a CE may be inappropriate because this decision is more properly made in an allotment management plan (AMP) or other determination of grazing suitability.	The issue is outside the scope of the proposed action.
	The scoping letter does not disclose what existing grazing authorization is in place and what data there may be on the use, trend and carrying capacity of the allotment.	The issue is outside the scope of the proposed action.
	...excluding livestock from the meadow for all or part of the season would likely alter the carrying capacity of the allotment. Without range condition and trend data, all that may occur is transferring the problem here to another place. The uplands may become overgrazed as a result.	See Response below.
	Issues associated with this allotment (presumably, Purdue Creek) should have been made in the West Fork Potlatch EIS.	The issue is outside the scope of the proposed action.

Commenter	Comment	Disposition
Gary Mcfarlane Friends of the Clearwater	... theWest Fork Potlatch project file noted the then current grazing on the PurdueCreek allotment as 60 head, or cow-calf pairs, (12 on national forest and 48 on other) from 6/16 to10/31. The FEIS and ROD approved exactly the same management (FEIS II-26 and ROD 4 and 5). Theproject file and FEIS also have identical utilization standards of 50%, acontinuation of current standards from then till now.	The issue is outside the scope of the proposed action.
	That status quo is called intoquestion in the project files.Document 2/26/96 states: “The historical record on the Purdue Creek allotmentindicates for the 10 years previous to 1995, the average utilization was 60%, which is abovethe 50% target for...upland utilization. On the basis of this utilization data...it would not appear unreasonable to belooking at a reduction in Animal Months from 10-25%. We can calculate what thereduction would be to theoretically reach the 50% utilization figure to come up with a specificnumber.”	The issue is outside the scope of the proposed action.
	The project file memo (1/24/2000) indicates Purdue Creek allotment’s five year average in both pastures (Purdue Creek and Nat Brown) had utilization figures from57 to 66%. Thus, the recommendation for a reduction in numbers ... was valid.	The issue is outside the scope of the proposed action.
	This does not appear to be an issue of distribution that fencing can solve.	5
	It seems to be an issue of stocking rates just as the range conservationist haddetermined in 1996. Have any of those problems, which were identified nearly twenty years ago, beenaddressed. If so, how were they addressed?	The issue is outside the scope of the proposed action.
	Given the importance of this area as an anadromous fishery, grazing should be looked at morecarefully. Fencing may only be an ineffective band aid.	5
Jonathan Oppenheimer and Mackenzie Case, Idaho Conservation League	With regards to the Nat Brown Fencing (Palouse RD) ... project we do not have any majorconcerns.	Thank you for your comment.
	Analyses for each ... project should consider how the project isconsistent with various management directions, including but not limited to theEndangered Species Act, Nez Perce and Clearwater National Forest Plans,Clean Water Act and any other relevant laws and agency direction.	The issue is standard procedure.

Commenter	Comment	Disposition
Daniel Stewart Idaho Dept. of Env. Quality	Project activities may affect the NP-CW NF's ability to achieve flow based on pollutant allocation reduction associated with Forest land or management activities.	3
	Projects initiated after the establishment of TMDL pollutant load allocations can adversely affect water quality through a reduction in load capacity.	3

Forest Service Response

Response: The Purdue Creek allotment allows for 73 AUMs on NFS land. Based on forage clip weights, the meadows inside the proposed exclosures (both expanded and new) represent 3.2 AUMS or 4.4% of the allocated AUMs, a small fraction of the allotment's total available forage. As stated in the scoping letter, the exclosures would be grazed occasionally—for example, a few days in the fall—for forage plant health.

The upland transitory range areas have historically been lightly used on this allotment. Monitoring results at an upland site showed end of season utilization averaged 26% between 2011 and 2013, while in 2015 an end of season ocular inspection on the ridge immediately east of the Nat Brown meadow showed no visible signs of grazing. Although the proposed exclosures would shift grazing towards upland sites, the upland transitory rangelands, as shown through past monitoring, can support the expected increase in livestock use.

Finally, grazing on NFS lands is conditional in upland areas to targets of 50% utilization. Per the Annual Operating Instructions, if and when utilization reaches the 50% threshold in the uplands, the cows would be removed from the allotment for the season.